

Daryl Fallas
77 Parker Avenue
Deal, NJ 07723
732-539-9025

CLERK, U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
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October 9, 2012 2012 OCT 10 AM 10 58

Clerk, U.S. District Court
402 E. State Street, Room 2020
Trenton, NJ 08608

Re: Case Name: FALLAS v. SCHACHTER PORNOY, LLC / CAVALRY SPV I,
LLC
Case Number: 3:12-cv-05664-PGS-DEA

Dear Clerk:

Please file the attached **OBJECTION TO DEFENDANT CAVALRY SPV I, LLC'S
MOTION TO DISMISS.**

Please call me at the above number with any questions or concerns.

Thank you.

Very truly yours,



Daryl Fallas
Plaintiff (PRO SE)

Re: Case Name: FALLAS v. SCHACHTER PORNOY, LLC / CAVALRY SPV I, LLC
Case Number: 3:12-cv-05664-PGS-DEA

OBJECTION TO DEFENDANT CAVALRY SPV I, LLC'S MOTION TO DISMISS

I hereby oppose the dismissal in this case for the following reasons:

1. This Court lacks jurisdiction in this matter for the reasons already stated in previous filings; and, in addition to which the FDCPA specifically states the following:

§ 813. Civil liability [15 USC 1692k]

(d) An action to enforce any liability created by this title may be brought in any appropriate United States district court without regard to the amount in controversy, or in any other court of competent jurisdiction, within one year from the date on which the violation occurs.

New Jersey has adopted the FDCPA into its own law. In addition to which, as I've stated in previous filings, we also allow for punitive damages for the reasons stated.


2. These two defendants are co-conspirators in fraudulent activity. One cannot exist without the other. If given the opportunity, I'm convinced that I will prove this to a jury, not only by a preponderance of the evidence, but beyond a reasonable doubt. The two Defendants must be tried together for a jury to see the conspiracy to commit fraud. And they must be tried together in a court which allows for punitive damages, if only so an example may be made.

Individually, they cannot thrive. Together, they're a cancer to society. I stand the best chance of excising this cancer in the New Jersey State Courts with New Jersey Laws.

I certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements made by me are intentionally false, I am subject to punishment.

Dated: 10-9-12

Signed: _____


Daryl Fallas (pro se)

Daryl Fallas
77 Parker Ave
Deal, NJ 07723



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